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	1 4		
1	JERRY S. BUSBY Nevada Bar No: 001107		
2	GREGORY A. KRAEMER Nevada Bar No: 010911 COOPER LEVENSON APRIL		
4	NIEDELMAN & WAGENHEIM, P.A. 6060 Elton Avenue, Suite A		
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7	Attorneys for Defendant		
8	Firstsource Advantage, LLC		
9			
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12			
13	GREGORY DANAHER,	Case no. 2:13-cy-00128-APG-PAL	
14	Plaintiff,	Case 110. 2.13-CV-00120-A1 G-1 AL	
15	· ·	DEFENDANT FIRSTSOURCE ADVANTAGE.	
16	VS.	LLC'S OBJECTION TO PLAINTIFF GREGORY DANAHER'S SUPPLEMENT TO FIRST AMENDED COMPLAINT	
17	FIRSTSOURCE ADVANTAGE, LLC,	FIRST AMENDED COMPLAINT	
18	Defendant.		
19]	
20	Defendant Firstsource Advantage, LLC hereby Objects to Gregory Danaher's		
21	Supplement to His First Amended Complaint. Plaintiff has not been granted leave to amend		
22	his Complaint and the deadline to amend the pleadings was June 4, 2013 pursuant to this		
23	Court's Scheduling Order dated April 10, 2013. Moreover, Plaintiff's supplemental facts		
24	consist of mischaracterizations of Defendant's discovery responses. At no point did		
25	///		
26	111		
27	///		
28	///		
	1	Objection to Supplement to FA	
}	07/07 00/196212	2:13-cv-00128-APG-PA	

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Defendant call Plaintiff using an autodialer and Defendant never admitted to that fact in its		
discovery responses. Defendant requests that Plaintiff's Supplement to His First Amended		
Complaint be stricken from the record.		
Dated this 17th day of July, 2013.		

COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.

By: /s/ Gregory A. Kraemer

Jerry S. Busby

Nevada Bar No: 001107

Gregory A. Kraemer

Nevada Bar No: 010911

6060 Elton Avenue, Suite A

Las Vegas, NV 89107

Attorneys for Defendant

FIRSTSOURCE ADVANTAGE, LLC

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of COOPER LEVENSON APRIL

NIEDELMAN & WAGENHEIM, P.A. and that on this 17th day of July 2013, I did cause a true copy

of the foregoing **DEFENDANT FIRSTSOURCE ADVANTAGE, LLC'S OBJECTION TO**

PLAITNIFF GREGORY DANAHER'S SUPPLEMENT TO FIRST AMENDED COMPLAINT

to be placed in the United States Mail, with first class postage prepaid thereon, and addressed as follows:

Gregory Danaher 7901 Quill Gordon Avenue Las Vegas, NV 89149 Plaintiff in Proper Person

By /s/ Theresa H. Rutkowski

An Employee of COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM, P.A.